

Easterling, Deborah

From: Erick Karlen <ekarlen@greenlots.com>
Sent: Wednesday, May 15, 2019 8:48 PM
To: PSC_Contact
Cc: Thomas Ashley
Subject: [External] Comments of Greenlots Regarding ORS Report and Duke's Amended Application filed in Docket No. 2018-321-E & 2018-322-E
Attachments: Greenlots Comments on ORS Report and Duke Amended App 5.15.19.pdf

Hi-

Attached please find Greenlots' comments regarding the ORS Report and Duke's Amended Application as filed in Docket No. 2018-321-E and Docket No. 2018-322-E on April 1, 2019.

Please kindly file this appropriately in the two relevant dockets noted.

Thanks,

Erick Karlen
Policy Advisor, Greenlots
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May 15, 2019

-Docket No. 2018-321-E-
-Docket No. 2018-322-E-

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

RE: Comments of Greenlots Regarding the ORS Report and in Support of Duke's Amended
Transportation Electrification Pilot

Dear Ms. Boyd,

Greenlots submits these comments to the Public Service Commission of South Carolina ("the Commission") regarding the Office of Regulatory Staff ("ORS") Report on Proposed Electric Transportation Pilots ("the Report") filed on April 1, 2019 in Docket No. 2018-321-E and Docket No. 2018-322-E, and in support of Duke Energy Progress, LLC's and Duke Energy Carolinas, LLC's (collectively, "the Company" or "Duke") Amended Application for Approval of Proposed Electric Transportation Pilot ("Amended Application") filed in the same dockets on April 1, 2019. These comments build upon our prior letter dated November 2, 2018 in support of Duke's original pilot filing(s), and our additional broader comments dated December 10, 2018.

Greenlots is a leading provider of electric vehicle (EV) charging software and services committed to accelerating transportation electrification in South Carolina, and a wholly owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing percentage of the Level 2 infrastructure. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.

The ORS Stakeholder Process and Report

Greenlots was an active participant in the ORS-facilitated workshop and stakeholder process that resulted in the report filed into these dockets in early April. The process allowed all stakeholders to voice their opinions and recommendations regarding Duke's proposed pilot programs for consideration. As a result of the stakeholder process, broad consensus was reached in support of the pilots and on an array of program details.

Greenlots wishes to express its strong support for the aim of the stakeholder process, the process itself, and the resulting report which is appropriately reflective of the views expressed by stakeholders. While consensus was not reached on every topic, it was reached on an

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uncharacteristically wide array of issues, demonstrating both the breadth of support for Duke's filing, and the quality and appropriateness of the pilot programs the Duke has designed and proposed.

Importantly, in areas where there wasn't consensus, this was generally on account of a differing view held by a single stakeholder rather than a result of broadly differing stakeholder perspectives.

Duke's Amended Application

The amended application filed by Duke on April 1 incorporated participant feedback from the stakeholder process and is reflective of the recommendations of stakeholders and those contained in the ORS report. These pilot modifications are appropriate, enhance the overall pilot, and are broadly reflective of the views of stakeholders raised during the workshop and conference calls. Accordingly, Greenlots strongly supports Duke's program enhancements and amended application.

During the stakeholder process, Greenlots and other participants voiced support for an expanded DCFC pilot, and we are glad to see that Duke has wrapped this recommendation into its amended application. Fast charging infrastructure is critical in alleviating range anxiety for EV drivers, which is becoming increasingly important as EV battery capacities and corresponding ranges grow. It also provides critically needed charging options to those who cannot charge easily at home – a demand that will grow as the broader market adopts EVs – and those exploring new mobility models, including carsharing and ridesharing. Indeed, fast charging infrastructure creates a buoying effect on other forms of charging, including long dwell time charging (such as residential) that can be readily managed. Thus, growing the DCFC component of the pilot will have a positive effect on other aspects of the pilot portfolio. Additionally, visible public DCFC infrastructure provides confidence to potential EV buyers, itself working as a form of education and outreach, directly supporting EV sales and growing the market.

Greenlots also supports Duke's amended EV school bus pilot, which similarly is directly responsive to stakeholder feedback. In discussion with school district stakeholders, it became clear that the proposed incentive was not sufficient to support the purchase decision of an electric school bus over a traditional school bus. These changes close this gap in the incentive level between what is needed and what was to be offered, which will directly enhance the pilot's impact while better positioning it for success.

Finally, we note that during the stakeholder process there was a light discussion regarding technology that did not result in a specific recommendation in the ORS report. Greenlots recognizes and supports the need for flexibility and optionality for utilities to make technology decisions that have significant implications for pilot and program management and success.

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Accordingly, we do not support any proposal or arguments for such program implementation details and nuances to be prescribed in the context of this proceeding.

Conclusion

Greenlots supports the ORS report and the stakeholder process that informed it. In balancing and appropriately considering different viewpoints, both the report and the amendments proposed by Duke strengthen an already strong pilot that is appropriately designed to efficiently support foundational transportation electrification needs to grow the market for electric vehicles and electric vehicle charging products and services.

For these reasons and with these additional comments, Greenlots respectfully requests that the Commission approve Duke's Amended Transportation Electrification Pilot. We look forward to continued engagement in efforts supporting transportation electrification in South Carolina, and thank the Commission for consideration of these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley
VP, Policy